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10
11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN MARIANA ISLANDS

13 U.S. EQUAL EMPLOYMENT
14 OPPORTUNITY COMMISSION,

15 Plaintiff,

16 v.

17 ROME RESEARCH CORPORATION; and
18 DOES 1-10, Inclusive,

19 Defendants.

Civil Action No. CV 07-0030

**DEFENDANT ROME
RESEARCH CORPORATION'S
WRITTEN RESPONSE TO THE
COURT'S APRIL 7, 2008 ORDER
TO SHOW CAUSE**

**Hearing: April 22, 2008
Time: 10:00 a.m.**

1 Defendant Rome Research Corporation ("RRC") submits this written response to the Court's
2 April 7, 2008 Order to Show Cause. Local counsel for RRC, whose appearance is being noticed
3 herewith, will be appearing as required by the Court at the scheduled OSC hearing on April 22,
4 2008. However, RRC and its counsel also wished to make a written response given the importance
5 of this matter and their desire to correct any errors committed, and assure the Court they will not
6 reoccur in the future.

7 Initially, RRC and its counsel wish to assure the Court that the failure to respond to the
8 Court's March 14, 2008 Order by submitting pro hac papers was inadvertent. Specifically, as set
9 forth in the accompanying Affidavit of Sieu K. Che, notice of the Court's March 14 Order was not
10 received by RRC's off-island counsel until April 7. Immediately thereafter, local counsel was
11 located and obtained. Pro hac papers have now been drafted and are attached to the Che Affidavit so
12 that the Court can be assured that counsel is prepared to follow the March 14 Order.

13 Further, local counsel has contacted counsel for the Plaintiff EEOC, Greg McClinton. He
14 stated that the EEOC does not wish to pursue RRC's default, and is willing to enter into a new
15 stipulation with local counsel extending the time for RRC's answer until after the upcoming
16 mediation. Hence, no party faces prejudice justifying entry of a default in this matter. Accordingly,
17 for these reasons and the others that will be stated at the April 22 hearing, RRC respectfully asks that
18 its default not be entered, and that it be permitted to submit a new stipulation and/or the pro hac
19 papers of its off-island counsel.
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21 Respectfully submitted this 18th of April 2008

22 Calvo & Clark, LLP
23 *Attorneys for Rome Research Corporation*

24 By: 
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26 DANIEL M. BENJAMIN
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